

Chapter 6: Identification and Notification of Monuments and Antiquities

India's rich repository of heritage includes an estimated 4 lakh plus heritage structures and 58 lakh plus antiquities³⁵, mostly under the control of Central and State level authorities, museums, religious bodies, etc. The identification and documentation process of these monuments/antiquities and issues related with their notification have been discussed in this chapter.

6.1 National Database of all Monuments and Antiquities

With the objective to prepare a national database of all monuments and antiquities, National Mission on Monuments and Antiquities (NMMA) was launched by the Government³⁶ (2007), initially for a period of five years *i.e.* 2007-2012. In order to complete the documentation process and continue the momentum, this period was extended by another five years (2012-2017) and later NMMA was merged with ASI (October 2017). Delay in setting-up of NMMA and lack of planning leading to failure in achieving its objective was pointed out in the previous Report.

The PAC had asked the Ministry that a national register highlighting the details of each and every ancient monument, sites and remains both of National and State importance, including artefacts lying in museums, government treasuries and/or in other government and private possession spread over the country, may be prepared. The progress and current status of documentation and database work initiated by NMMA in 2007 is depicted in Table 6.1:

Table 6.1: Progress in Documenting Monuments and Antiquities

Period	Documentation		Uploading of Data	
	Monuments	Antiquities	Monuments	Antiquities
2007-12	34794	48411	0	0
2012-17	1.84 lakh	15.0 lakh	9688	2.40 lakh
2017-19*	3228	1.70 lakh	312	10.13 lakh
2019-20	6039	32537	859	8952
2020-21	3186	2400	703	1569
Total	2.31 lakh	17.53 lakh	11562	12.64 lakh

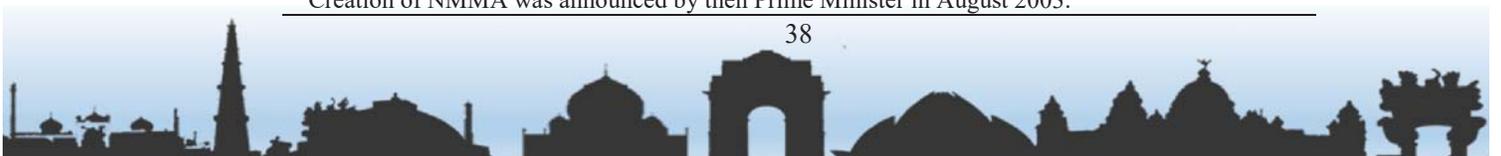
*Period counted upto/from October

Note: For 2019-20 and 2020-21, status reported by NMMA (in October 2020 and December 2021) was upto October 2020 and from November 2020 to 1 December 2021.

It would be seen from the **Table 6.1** that since 2017, the process for documentation of monuments and antiquities had considerably slowed down. NMMA, in its reply

³⁵ Source: ASI

³⁶ Creation of NMMA was announced by then Prime Minister in August 2003.



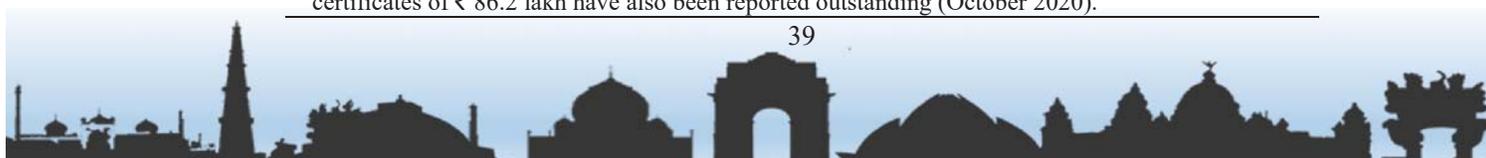
(October 2020), attributed logistical insufficiency, ineffective monitoring and budgetary constraints as the reasons for defaults in achieving the targets. It also stated that there was a need for reviewing the existing documentation process/guidelines, identify and revive Documentation Resource Centres (DRC)/State Level Implementing Committees (SLIC), initiate training programmes and workshops at the local levels. Audit, however, noted additional reasons to conclude that the whole project was poorly implemented:

- There was no defined strategy or road-map for documenting the estimated 4 lakh monuments and 58 lakh antiquities. No annual target or annual progress in documentation work was available with NMMA. After giving two consecutive extensions of five years each, NMMA was merged with ASI without any time-frame for completion of the work.
- The project was undertaken without ascertaining the availability of technical capability. NMMA intimated absence of any commercial agency in the country to carry out the research oriented documentation work. The staff strength available in ASI was also inadequate to complete the work.
- Since March 2015, no workshop was held to facilitate documentation work, rectify mistakes or to provide clarification to agencies involved in the process. As a result, there was absence of a system for regularly up-grading the technical capability of executing agencies, which affected the work process.
- The DRCs identified to carry out the work were insufficient and became dormant over the years. The SLICs constituted for the identification of DRCs and evaluation of their work were also not functional. As a result, there was absence of an effective mechanism to control the work output and fund utilisation by DRCs³⁷. Further, meetings of National Mission Monitoring Committee to periodically review the work of NMMA were not held after August 2016.
- In respect of 1.80 lakh monuments, the documentation work carried out was based on secondary sources and not verified through primary survey. After scrutinizing the work and deleting certain data, NMMA reported (December 2021) following reduced progress status:

Period	Documentation		Uploading of Data	
	Monuments	Antiquities	Monuments	Antiquities
Revised Progress	1.84 lakh	16.83 lakh	11406	12.60 lakh

Ministry/ASI stated (January 2022) that a large number of antiquities and sites were

³⁷ Against the assigned documentation of 23,526 monuments and 8.45 lakh antiquities, DRCs had completed documentation of only 5,444 monuments and 2.98 lakh antiquities. Utilisation certificates of ₹ 86.2 lakh have also been reported outstanding (October 2020).



under the custody of States, Private organisations, Trusts and individuals and unless these agencies consider for collaboration with NMMA, no target can be achieved. It also informed about two initiatives (i) initiation of concept of engaging Young Archaeologist for carrying out primary survey and documentation of antiquities, and (ii) rolling advertisement for engagement of DRCs for the work.

A successful completion of the NMMA project would have provided an authentic inventory of most of the monuments, sites and antiquities in the country. The achievement would have been helpful in greater synergy amongst the agencies involved in preservation of monuments and prevention of illegal trade of antiquities. However, due to the reasons mentioned above, even after 14 years of establishment of NMMA, documentation work of only 46 *per cent* monuments and 29 *per cent* of antiquities have been completed.

6.2 Database of Monuments and Antiquities with ASI

Out of the estimated four lakh plus heritage structures in the country, 3693 monuments and archaeological sites are under the jurisdiction of ASI (December 2021). *The PAC had recommended preparation of inventory of all CPM within a period of two years, which was to be updated every five years. This inventory, displaying various information e.g. geographic location, category, distance from nearest city/town, historical and cultural significance, encroachment details, etc., was to be made accessible to public through a portal.*

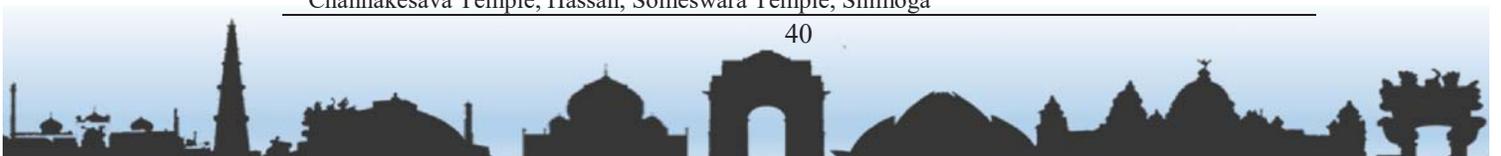
It was, however, noted that a centralised database/inventory of all CPM displaying all the recommended information to the public was still not available (March 2022). It was further noted that information on CPM, displayed online through websites of respective Circles, was also not uniform³⁸. While some Circles were displaying the history, notification, location of concerned monuments (*e.g.* Dehradun, Bengaluru), others were only providing list of respective monuments (*e.g.* Agra, Bhopal). In Chandigarh and Bengaluru Circles, important information *i.e.* notification detail in respect of three³⁹ and two⁴⁰ monuments respectively were not available. Similarly, in Bhubaneswar Circle, out of 80 monuments/sites, Gazette Notification for only 38 was available. Also, in Bhubaneswar Circle, against the notified four Colossal *Matrikas* (sculptures), only three were shown in the inventory. Monuments where final notification was not issued are also listed at **Annexe-6.2(b)**.

ASI intimated (December 2020) that the data with respect to Gazette Notification for 3150 CPM had been compiled. Ministry/ASI stated (January 2022) that all Gazette Notifications will be part of Indian Heritage Mobile Application under development.

³⁸ Also refer Para 4.1, in some of the Circles, websites were not functional.

³⁹ *Baoli Ghaus Ali Shah-Gurugram, Shah Ibrahim Tomb-Narnaul, Shah Quli Khan's Tomb-Narnaul.*

⁴⁰ *Channakesava Temple, Hassan, Someswara Temple, Shimoga*



However, the fact remains that the inventory is yet to be completed.

In respect of antiquities, though ASI had estimated 58 lakh plus antiquities at all India level, they had no database or inventory of antiquities in their possession.

6.2.1 Categorisation of the Monuments

According to AMASR (Amendment and Validation) Act, 2010, the Central Government, on the recommendation of the NMA, was to classify all the monuments and archaeological sites under the jurisdiction of ASI in accordance with the prescribed eight categories⁴¹. This categorisation was to be done on the basis of information provided to NMA by ASI which was to be exhibited on government website for general public. In this regard, Ministry had intimated the PAC that categorisation of monuments was completed and handed over to NMA for their consideration and making recommendations to the Ministry. However, NMA intimated (November 2020) that a list of only 915 monuments (out of 3693 CPM) had so far been prepared, which was still under consideration due to non-finalisation of monuments under Category III.

Despite being pointed out in the previous Report and the PAC's Report, insufficient efforts were made by ASI regarding categorisation of all the CPM.

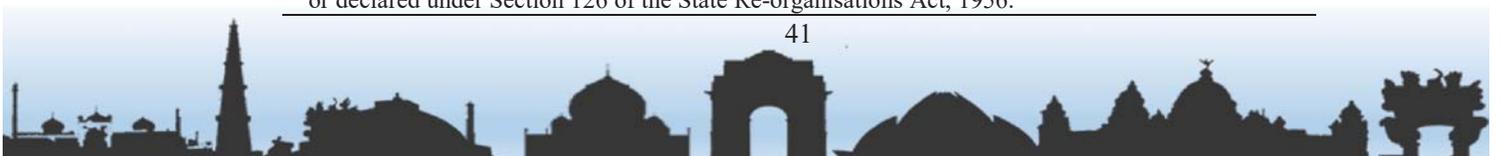
6.3 Monuments of National Importance under ASI

According to AMASR Act, 1958 ancient and historical monuments, archaeological sites and remains declared under the AHMASR Act, 1951⁴², are considered of national importance. AMASR Act also specifies that in case the Central Government is of the opinion that any ancient and historical monument or archaeological site and remains had ceased to be of national importance, it may declare so by notification. In the previous Report, several issues connected with identification and declaration of a monument of national importance were reported. In this regard, PAC had also made several recommendations. These issues, examined during the follow-up audit, are discussed below:

⁴¹ Vide Rule 6 of NMA Rules, 2011 framed under AMASR (Amendment and Validation) Act.

Category I	World Heritage Sites
Category II	Tentative list of World Heritage Sites
Category III	Identified for inclusion in the World Heritage tentative list
Category IV	Ticketed monuments (other than mentioned above)
Category V	Identified for categorisation as ticketed monuments
Category VI	Living monuments which receive large number of visitors
Category VII	Other monuments located in the Urban/semi-urban limits and in the remote villages
Category VIII	Other category as the Authority may deem fit

⁴² or declared under Section 126 of the State Re-organisations Act, 1956.



6.3.1 Criteria for defining monument of national importance

In the previous Report, Audit had pointed out several instances indicating absence of defined set of criteria for declaring a monument to be of national importance. *In this regard, the PAC had recommended that guidelines for determination of monuments of national importance be finalised at the earliest.* It was noted that these guidelines have still not been framed. As a result, in below mentioned categories, ASI had adopted different criteria for defining monuments of national importance:

- a) Single complex, where more than one monument or independent structure was notified as a separate monument while in other instances all structures within a complex were notified as single monument;
- b) Instances where only a portion of the whole structure was notified as monuments of national importance while its other part of the structure was left unprotected
- c) Cases where *Kos-Minars* were also protected by State Archaeology Department

These cases are illustrated at **Annexe 6.1**. Ministry/ASI stated (January 2022) that it was working on guidelines as recommended by PAC.

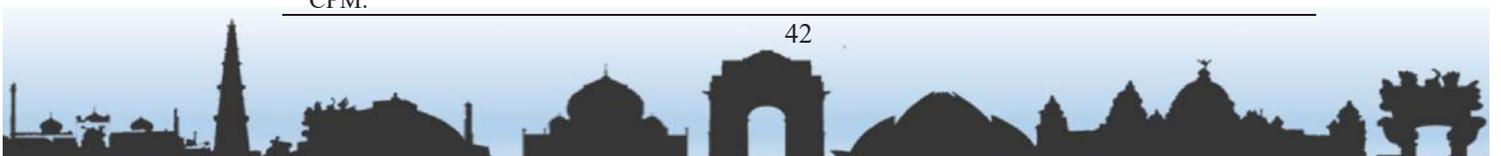
6.3.2 Survey to identify monuments of national importance

The PAC had noted that a comprehensive survey to identify monuments of national importance for placing them in the centrally protected category was overdue. The Ministry in its ATN (April 2016) had also agreed that there was an urgent need to review and survey all the ancient monuments/sites declared as being of national importance and find out whether they still continue to be of national importance. The PAC had recommended that after the finalization of the guidelines (as mentioned in previous para), a comprehensive survey should be conducted to identify the exact number of monuments of national importance that can be protected.

During the period 2013 to 2021 (*i.e.* between earlier Performance Audit and current follow-up audit), no comprehensive survey/review to identify monuments of national importance that can be protected was undertaken by ASI⁴³. In this regard, Chandigarh Circle also reported that no such guideline was received by it from ASI Headquarters⁴⁴. Further, there was no effort by ASI to identify those monuments which over the period had lost their significance and need to be shifted to the States. The initiative was not even undertaken on a smaller scale as a pilot project in the selected States (December 2021).

⁴³ According to the submission made by the Ministry with PAC, earlier survey undertaken by ASI was in 1998-99.

⁴⁴ Chandigarh Circle, however, conducted three surveys at Bara Talao and Solah Rahi Talao, Rewari (June 2015), Archeology mound, Mitathai, Bhiwani (September 2020) and Archaeological mounds 6 & 7 at Rakhigarhi, Hisar (November 2020). None of the monument was included in the list of CPM.



ASI informed (January 2022) that taking of survey or exploration to identify and document ancient remains, site or structure is an ongoing phenomenon. As such, the view of PAC was not relevant and not possible to be implemented. Further, in consultation with the Ministry, it was working on modalities to be adopted for monuments which had lost their significance.

The reply of the Ministry/ASI (January 2022) was contrary to their earlier response (April 2016) to the PAC recommendations.

Structural remains of Tomar dynasty-King Anangpal II, founders of Delhi

In the eleventh century A.D., rulers of Tomar dynasty shifted their royal seat from Anangpur (Faridabad, Haryana) to *Lal Kot* (Delhi) and founded a new city called *Dhill* or *Dhillikapuri* in the vicinity of the erstwhile temple township of Yoginipura (near Qutub Archaeological Area). With the re-establishment of the nail of earth (*killi-dhill*– Mehrauli Iron Pillar brought from Mathura in Samvat 1109/1051CE), King Anangpal-II⁴⁵ was considered as founder of Delhi.

Remains of the walls of *Lal Kot* built by King Anangpal-II have been notified by ASI as protected monument. *Anang Tal* is another structure (reservoir) in the Qutub Archaeological Area, believed to be constructed by King Anangpal-II. ASI had undertaken excavation at *Anang Tal* (1991-95) but the structure was not protected by ASI or Delhi State Archaeology Department.

A visit to *Anang Tal* revealed that sewage from nearby areas was being discharged into the reservoir and remains of the monument were in a neglected state as depicted in following photographs:



The PAC had recommended that ASI/Ministry may consider issuing guidelines whereby Ancient monuments (predating say 1700 AD) and contemporary monuments that are 100 years old and of national importance stand automatically protected. However, no such guidelines declaring 100 years old monuments as of national importance was found in existence. As a result, *Anang Tal*, a heritage structures not protected by any agency was in its last stage of disappearance. Ministry/ASI intimated (January 2022) that a proposal for protection of the structure was under consideration.

Historical source: National Seminar document prepared by NMA, Ministry of Culture in February 2021

⁴⁵ Also mentioned as Anang Pal, Anangapala in sourced document.



6.3.3 Process of Identifying Monuments of National Importance

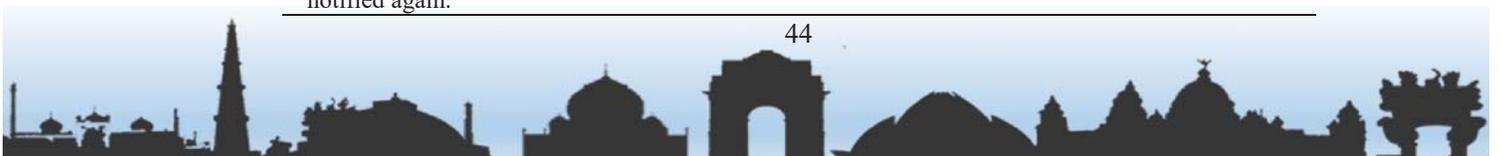
The procedure followed for notifying certain monument as being of national importance included receipt of proposal from the Circle office, its scrutiny by a Committee at ASI Headquarters and thereafter approval of the Minister for issue of relevant preliminary notification in the official gazette. ASI, based on specific requests/inputs received from respective Circles, had revised the list of CPM from 3,678 to 3,693 during the period 2013-2021.

ASI, however, had no defined procedure/schedule for reviewing/modifying the list of CPM. Audit noted:

- In respect of notification of one new monument (in 2018) and de-notification of two monuments⁴⁶ (in 1931 and 1999), updation in the list of CPM was carried out in October 2020 with significant delay.
- In Delhi Circle, Tomb of Ghaziuddin Khan, Ajmeri Gate (notified in 1925) was not included in the list of CPM (till October 2020). It was noted that another monument Tomb of Ghiasuddin Khan, Tughlakabad was included in the list twice and the correction was made in October 2020 by inserting Ghaziuddin Khan and removing Ghiasuddin Khan. Ministry/ASI accepted (January 2022) that this was due to correction of typographical mistake in the list of monuments.
- Bhopal Circle had submitted (July 2014) a proposal with ASI Headquarters for de-notification of the monument i.e., Jain Temples on the Hills, Kundalpur, Damoh, Madhya Pradesh. Though the proposal was in accordance with the judgement of Apex Court (2014) declaring the monument as State protected monument, Ministry/ASI stated (January 2022) that in view of Section 3 of AMASR Act, 1958⁴⁷ there was no need to de-notify the monument. Audit noted that despite the decision of the Apex Court, this monument continues to be included in the list of 3693 CPM.
- Proposal sent (June 2001) by Dharwad Circle regarding inclusion of excavated site, Benagutti as monument of national importance was still pending with ASI Headquarters. In this regard, no follow-up was attempted by the Circle office to get the approval.
- De-notification of monuments proposed by Mumbai Circle in September 2007 and in November 2013 had still not been carried out by the ASI.

⁴⁶ Three structures at internal building of Siri Fort (1931) and Site of siege battery with inscription (1999) both in Delhi Circle.

⁴⁷ All monuments, sites and remains which have been declared by AHMASR Act, 1951 to be of national importance shall be deemed to be of national importance and need not be notified/de-notified again.



6.3.4 Discrepancy in the list of Centrally Protected Monuments

In the previous Report, discrepancies were pointed out in the list of CPM due to following reasons:

- a) same monuments were notified twice;
- b) monuments were declared protected without any notification;
- c) monuments were protected both by Centre and State; and
- d) the antiquities were declared as monument

Despite assurance by the Ministry for rectification of these reported discrepancies, the errors still existed in the list of CPM as detailed in **Annexe 6.2**. Ministry/ASI replied (January 2022) that the observation of PAC had been noted and corrective measures shall be taken to resolve the issues pointed out by Audit.

6.3.5 De-notification of Missing Monuments

In the previous Report, Audit had reported 92 CPM as missing. The Ministry/ASI intimated (August 2017/ March 2021) that out of 92 missing monuments, 42 had been traced, 14 had been affected due to rapid urbanisation, 12 had submerged under reservoir/dam and 24 were not traceable.

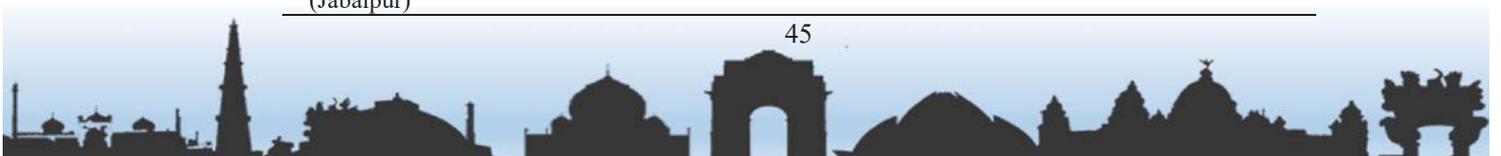
During joint physical inspection it was observed that two monuments in Delhi Circle⁴⁸ identified by ASI as physically existing/traced and four monuments in Bengaluru (3) and Jabalpur (1) Circles⁴⁹ reported as affected due to urbanisation/submerged under water were also not in existence. Similarly, in Kolkata Circle, six monuments reportedly submerged during construction of dam continue to be included in the list of CPM, despite proposal for their de-notification having been made in July 2017. Audit further noted that 24 monuments accepted by ASI, as not traceable, had not been de-notified and they continue to be included in the list of CPM. Details of monuments which need to be de-notified due to their non-existence are given in **Annexe 6.3**. Ministry/ASI stated (January 2022) that it was working on modalities for de-notification of untraceable monuments. It further stated that the process requires strict scrutiny and takes longer time.

Antiquities missing from submerged Monuments

Out of six monuments declared submerged, statues pertaining to three monuments were reported by the Kolkata Circle as not traceable. However, during joint physical inspection, three statues similar to the images available in the inventory with the Circle office were found lying unattended and unprotected near the dam

⁴⁸ Nicholson Statue (reported existing), Tomb of Capt. Mc Barnett & others (reported affected). In the previous Report, it was mentioned that Nicholson Statue was gifted away (in 1960) by the Government of India to Government of Ireland.

⁴⁹ Pre-historic sites at Kittur, Hejjala and Chikkajala (all in Bengaluru), Fresco painting, Rewa (Jabalpur)



site. The Circle office was unable to confirm these unattended statues as the same artefacts notified along with the monuments (later submerged). It assured checking of its archive for confirmation. The action highlights the importance of preparation of database as the Circle office/ASI was unaware of its heritage collection.

An effective laid down procedure for identification of all monuments of national importance and its adherence is essential for better planning and prudent use of available resources for heritage conservation. However, inadequate efforts on the part of the Ministry/ASI to rectify discrepancies in the list of monuments indicates the lack of a comprehensive strategy for management of national heritage.

6.3.6 Hasty notification of Monuments

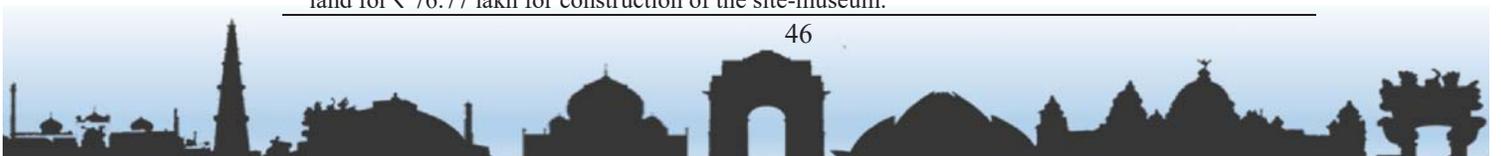
In the previous Report, Audit had pointed out that ASI had notified monuments⁵⁰ in Kolkata Circle without resolving the issues regarding encroachment/unauthorised occupancy. In this respect, the Ministry had stated (May 2013) that such actions were taken on the assurance given by the occupants and the State Governments. During follow-up audit, it was noted that the litigation regarding illegal occupants at one monument (Tamluk, Rajbati) was dismissed (2014) by the High Court in favour of ASI. However, both the monuments were still being illegally occupied by encroachers. Due to illegal occupants and hasty notifications, ASI was not able to carry out any preservation and conservation activities at these monuments resulting in their being in a dilapidated condition (refer pictures at Annexe 7.2, Para 4.2)⁵¹.

6.4 Antiquities

- The AAT Act empowers the Government to compulsorily acquire antiquities. Apart from compulsory acquisition, ASI collects antiquities through exploration, excavation, survey, purchase, gifts, etc. ASI is one of the largest repositories of antiquities in India. However, as mentioned in Para 3.1, no comprehensive policy document for management of antiquities had been prepared and the exercise undertaken for review of AAT Act was still in process. In a press release (July 2021), the Ministry had informed that digitisation of the collection of 2.8 lakh artefacts of ten government museums and galleries (including national level museums, site-museums and modern art galleries) have been completed under *JATAN* software programme (refer Para 1.3).
- As mentioned in previous Report, ASI had no policy/standard for transfer/shifting/acquisition/custody of antiquities. It intimated (December 2020) that

⁵⁰ (i) Tamluk, Rajbati (ii) Clive House, Dum Dum and (iii) *Moti Jheel* Masjid

⁵¹ ASI had decided to shift its Tamluk site-museum from rented building to the monument. However, due to its illegal occupants and absence of restoration process, it had to purchase (2019) another land for ₹ 76.77 lakh for construction of the site-museum.



at the time of transfer of antiquities, neither any agreement with the associated firm nor any insurance is being done.

- *The PAC had recommended the Ministry to explore and take necessary steps to recover or procure antiquities which are of cultural significance to our country but have been sold to buyers abroad and also to bring back the artefacts/antiquities and/or Cultural Property of Indian origin that were taken outside the country.* Ministry/ASI stated (January 2022) that retrieval of antiquities is one of its focus area. The process for retrieval was accelerated since 2014 and 199 antiquities have been retrieved till date whereas it retrieved only 13 antiquities during the period between 1976 and 2013.

Conclusions:

- *After 2014, Ministry/ASI had made significant improvement in retrieving artefacts of Indian origin that were taken outside the country. However, work regarding preparation of centralised and digitised database of monuments and antiquities was lagging even after 14 years of establishment of National Mission on Monuments and Antiquities.*
- *Despite PAC recommendations and pointing out in previous Report, issues related with monuments of national importance viz. criteria and process for their selection, preparation of inventory of all protected monuments for public display, categorization of monuments, rectification of discrepancies in the list of monuments, their notification and de-notification, etc., have not been resolved.*

